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7 [Additional Counsel Appear on Signature Page]

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10 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

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12 IN RE ALLIED NEVADA GOLD CORP.,) Case No. 3:14-cv-00175-LRH-WGC
13 SECURITIES LITIGATION)
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STIPULATION

19 **WHEREAS**, Defendants have requested certain information related to fifteen (15)
20 former employees referenced in the Second Amended Class Action Complaint (“Former Employees”)
21 filed in the above-captioned action through Defendants’ First Set of Requests for Production to Lead
22 Plaintiff Andrey Slomnitsky, dated April 29, 2019 (the “Defendants’ Document Requests”), and
23 Defendants’ First Interrogatory to Lead Plaintiff Andrey Slomnitsky, dated June 7, 2019 (“Defendants’
24 Interrogatory”);

25 **WHEREAS**, Plaintiff has asserted various objections to providing the information
26 requested by Defendants’ Document Requests and Defendants’ Interrogatory relating to the Former
27 Employees, including but not limited to the name, last known address, last known telephone number and

1 last known email address of each of the Former Employees, based upon, but not limited to, Plaintiff's
2 counsel's attorneys' work product protections; and

3 **WHEREAS**, the parties are desirous of avoiding motion practice and further delay,

4 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, between

5 Plaintiff and Defendants, by and through their respective undersigned counsel, that:

6 1. Plaintiff shall provide the name, last known address, last known telephone
7 number and last known email address of each of the Former Employees ("Identity and Contact
8 Information") in response to Defendants' Document Requests and Defendants' Interrogatory, and
9 Defendants agree that the act of providing the Identity and Contact Information shall not be deemed,
10 constitute or argued by Defendants to be a waiver of Plaintiff's counsel's attorneys' work product
11 protections with respect to the Identity and Contact Information, if and to the extent such privilege exists
12 with respect to the Identity and Contact Information prior to its disclosure thereof pursuant to this
13 Stipulation and/or of any other objections(s) Plaintiff may have or assert to providing the Identity and
14 Contact Information pursuant to Defendants' Document Requests and/or Defendants' Interrogatory;

15 2. To the extent Plaintiff or his counsel contend documents responsive to any of
16 Defendants' Document Requests and/or Defendants' Interrogatory are subject to work product
17 protection or other privilege or objections and withhold such documents based thereon ("Withheld
18 Documents"), Plaintiff will provide a privilege log identifying the Withheld Documents; and

19 3. Plaintiff agrees that by entering into this Stipulation, Defendants reserve all of
20 their rights with respect to seeking further responses to Defendants' Document Requests and Defendants'
21 Interrogatory, including challenging any assertions by Plaintiff's and/or Plaintiff's counsel of privilege
22 or work product protection, other than as set forth above in Paragraph 1, above.

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1 Dated: July 10, 2019

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31 *Jones*

32 IT IS SO ORDERED.

33 DATED: July 10, 2019.

34 *William G. Cobb*

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36 UNITED STATES MAGISTRATE JUDGE